

October 14, 2021

*Document Electronically Filed*  
Honorable Andrew L. Carter Jr.  
United States Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007-1312

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Re: Regan v. Commissioner of Social Security  
Civil Action No: 1:21-cv-03534-ALC

Dear Judge Carter:

MEMO ENDORSED

This letter respectfully requests an extension of time of sixty days for Plaintiff's Motion for Judgment on the Pleadings in this matter. Plaintiff's Motion for Judgment on the Pleadings is currently due on October 22, 2021. However, due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met. Plaintiff cannot meet the current briefing deadline. This extension is needed to thoroughly and properly prepare her Motion. Plaintiff's counsel has contacted defense counsel who consents to this request. This would be a first request to extend the time to serve Plaintiff's Motion.

If this request is granted, Plaintiff's Motion for Judgment on the Pleadings will be due on **December 21, 2021**. Subsequently, in accordance with the pattern of the Standing Order at Dkt. No. 5, the Commissioner's response to the Motion for Judgment on the Pleadings would then be due on or before **February 22, 2022**. Plaintiff's reply, if any, will be due on or before **March 14, 2022**.

Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky

Howard D. Olinsky, Esq.  
Bar Code H06529  
Counsel for Plaintiff

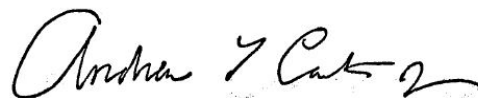
CC [via ECF]: Jason P. Peck, Esq. (Counsel for Defendant)

The request is hereby **GRANTED**.

**SO ORDERED.**

Dated: 10/15/2021

New York, NY



**Honorable Andrew L. Carter Jr.**  
**U.S. District Judge**